

UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Competitive Product Prices
Global Plus 3 Contracts (MC2016-152)
Negotiated Services Agreement

Docket No. CP2016-196

Public Representative Comments on Modification
to Global Plus 3 Negotiated Service Agreement

(July 5, 2016)

The Public Representative hereby provides comments pursuant to the Commission's Notice Initiating Dockets.¹ In that Notice, the Commission invited comments from interested persons, including the undersigned Public Representative, on the Postal Service's Request to modify the Global Plus 3 Negotiated Service Agreement.²

The Amendment to the contract allows permit linking. Without permit linking, the Postal Service contends that "some customers are unable to access discounted Global Plus rates". Motion at 1. It appears that these customers previously received prices through Docket No. CP2015-68, which originally expired on May 31, 2016. Motion at 2. The Commission approved a modification to the Docket No. CP2015-68 that extended the contract to June 30, 2016. See Order No. 3291.

The Commission approved the original contract in Order No. 3378 on June 21, 2016. The Global Plus 3 contract was approved as the baseline contract for future functionally equivalent Global Plus 3 contracts. Order No. 3378 at 7. The Commission issued one information request to clarify whether the amendment to will alter the baseline agreement. See CHIR No. 1. The Postal Service responded that it "does not intend Article 44 to be incorporated into the baseline agreement for purposes of evaluating future Global Plus 3 contracts". See Response to CHIR No. 1. The Postal

¹ Notice Initiating Docket(s) for Recent Postal Service Negotiated Service Agreement Filings, June 29, 2016 (Notice).

² Notice of the United States Postal Service to Modify Global Plus 3 Negotiated Service Agreement, June 27, 2016.

Service also filed a Motion for Temporary Relief,³ which the Commission partly granted.⁴

The instant Global Plus 3 contract serves as a baseline for future Global Plus 3 contracts, however the Postal Service contends that the amendment will not be incorporated into the baseline agreement. The presence of both an original contract and an amended contract for Docket No. CP2016-196 may potentially confuse future review of functionally equivalent Global Plus 3 contracts. In order to streamline future review of Global Plus 3 contracts the Postal Service should designate another contract as the baseline for functional equivalence.

Despite the potential confusion caused by the amendment, the Public Representative finds that the contract should continue to comply with section 3642(b) and with requirements section 3633(a).

The Public Representative respectfully submits the foregoing comments for the Commission's consideration.

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³ Motion for Temporary Relief Concerning Notice of the United States Postal Service of Filing Modification to Global Plus 3 Negotiated Service Agreement, June 29, 2016 (Motion).

⁴ Order Granting, In Part, Motion for Temporary Relief, June 30, 2016 (Order No. 3405).